

Pam Bassel  
Chapter 13 Standing Trustee  
7001 Blvd 26, Ste 150  
North Richland Hills, TX 76180  
Telephone: (817) 916-4710  
Facsimile: (817) 916-4770

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**IN RE:**

**ANGEL REE SANSOM**

**Debtor**

**Case No: 17-43890-ELM**

**Hearing Date:  
February 01, 2019**

**Docket Call at 8:30 AM**

**TRUSTEE'S OBJECTION TO DEBTOR'S MODIFICATION OF  
CHAPTER 13 PLAN**

**TO THE HONORABLE EDWARD L. MORRIS, U.S. BANKRUPTCY JUDGE:**

Now comes Pam Bassel, the Standing Chapter 13 Trustee and files this "Trustee's Objection to Modification of Chapter 13 Plan" heretofore filed herein by Debtor, and for the same would respectfully show the Court as follows:

It does not appear that the proposed plan base in the Modified Plan is sufficient to satisfy all the claims proposed to be paid under the Modified Plan. For that reason, the Modified Plan is "insufficient."

The Trustee asserts that the Plan may not meet the requirements of 11 U.S.C. § 1329 (b) (1) and 11 U.S.C § 1325(a)(3), the "good faith test." In this regard the Trustee would show that: The Modification violates the conduit provisions of the General Order because it is insufficient to provide for all of the ongoing monthly mortgage payments required under the terms of the Debtor's confirmed Plan or fails to reduce the number of ongoing monthly mortgage payments to the mortgage lender. Further, Debtor impermissibly requests that the balance on hand held by the Trustee be reserved to pay the attorney's fee for filing the Modification in violation of the order of payment required by the terms of the Debtor's confirmed Plan. In addition, the modification requests reduction of payment to the unsecured creditors to an amount lower than what was previously ordered by this court on September 17, 2018.

**WHEREFORE, PREMISES CONSIDERED**, the Trustee prays that said modified Plan not be confirmed unless and until it has been modified to cure all objections set forth herein above, and for general relief.

Respectfully submitted,

By: /s/ Pam Bassel  
Pam Bassel, Bar# 01344800  
Standing Chapter 13 Trustee  
Ethan Cartwright, Bar# 24068273  
Staff Attorney  
7001 Blvd 26, Ste 150  
North Richland Hills, TX 76180  
Telephone: (817) 916-4710  
Facsimile: (817) 916-4770

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing "Trustee's Objection to Modification of Chapter 13 Plan" was served on all parties enlisted to receive electronic notice on January 23, 2019, as well as all parties entitled to receive notice but not enlisted to receive electronic notice (including the Debtor and parties who have filed a notice of appearance requesting service by mail) by first class mail, postage prepaid, on or before January 23, 2019.

/s/ Pam Bassel

---

Pam Bassel